

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:

| | | |
|--------------------------|---|------------------------------|
| BRADLEY AND SUSAN LESLIE |) | Bankruptcy No. 18-23484-JCM |
| |) | |
| Debtors. |) | Chapter 13 |
| |) | Document No. _____ |
| |) | |
| |) | Related to Doc. No. 161, 162 |

**RESPONSE OF STONECIPHER LAW FIRM TO DEBTORS' LETTER AND COURT
ORDER**

AND NOW, comes Stonecipher Law Firm, and hereby files the Response Of Stonecipher Law Firm To Debtors' Letter And Court Order, and in support thereof states as follows:

1. At the hearing held August 29, Stonecipher agreed that its pursuit of the fees in the second fee application were moot and that the application may be denied.
2. As the Court noted in the Order entered October 4, 2023, Stonecipher agreed to limit its post-conversion legal fees to \$1,000, and the debtors acknowledged that in the courtroom.
3. Stonecipher's staff sent out both the pre-conversion and post-conversion bills, and attorney Roteman failed to catch the mistake.
4. The only bill that should have been sent was the post-conversion bill.
5. Had the debtors simply sent Mr. Roteman an email or picked up the phone and called, all of this could have been avoided.
6. Instead, they chose to send the court a letter questioning Mr. Roteman's integrity and honesty, something Mr. Roteman has never experienced in 30 years of practice.
7. Stonecipher formally wrote off the pre-conversion fees, and the invoices that were sent to the Leslie's earlier this week reflect that. Attached hereto is Mr. Roteman's

communication with his staff, which communication took place prior to the Court's receipt of the Debtors' letter, instructing that the fees be written off (redacted to remove the matters pertaining to other firm clients), along with the email and invoices sent to the Leslie's this week.

8. Stonecipher will continue to bill for post-conversion matters, capping its legal fees at \$1,000, as represented to this court at the hearing.

WHEREFORE, Stonecipher Law Firm respectfully requests that this Court find this response sufficient in addressing the court's concerns.

Respectfully submitted,

Dated: October 5, 2023

STONECIPHER LAW FIRM

/s/ Ronald B. Roteman

Ronald B. Roteman, Esquire

PA ID No. 66809

125 First Avenue

Pittsburgh, PA 15222

rroteman@stonecipherlaw.com

Attorney for the Debtors

EXHIBIT

From: [Ron Roteman](#)
To: [Joan DeArment](#)
Subject: RE: September 2023 Pre-bills
Date: Tuesday, October 3, 2023 9:59:00 AM

Yes, that's fine. Please send it out.

Ronald B. Roteman
Stonecipher Law Firm
125 First Avenue
Pittsburgh, PA 15222
ph. 412-391-8510, x-828
fax. 412-391-8522
rroteman@stonecipherlaw.com

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From: Joan DeArment <jdearment@stonecipherlaw.com>
Sent: Tuesday, October 3, 2023 9:49 AM
To: Ron Roteman <rroteman@stonecipherlaw.com>
Subject: RE: September 2023 Pre-bills

Ok – thanks for confirming I was nervous since the amount was so large. The (2) accounts are linked in TimeSlips so this is how the invoice printed. Is that what you had in mind? Please let me know if you need me to take the 585.00 off of the invoice completely. Thanks.

From: Ron Roteman <rroteman@stonecipherlaw.com>
Sent: Tuesday, October 3, 2023 8:50 AM
To: Joan DeArment <jdearment@stonecipherlaw.com>
Subject: RE: September 2023 Pre-bills

Correct.

Ronald B. Roteman
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From: Joan DeArment <jdearment@stonecipherlaw.com>
Sent: Monday, October 2, 2023 4:30 PM
To: Ron Roteman <rroteman@stonecipherlaw.com>
Subject: RE: September 2023 Pre-bills

Hi, Ron. I just wanted to confirm with you that I'm writing off Leslie # 585.00 for \$11,676.17? Thank you!!

From: Ron Roteman <rroteman@stonecipherlaw.com>
Sent: Monday, October 2, 2023 1:24 PM
To: Joan DeArment <jdearment@stonecipherlaw.com>
Subject: RE: September 2023 Pre-bills

Thanks.

Please make the following changes:

- 1.
2. Leslie – please write off 585.00. 585.02 is fine;
3. From RBR consult file:
 - a.

Thank you. Ron

Ronald B. Roteman
Stonecipher Law Firm
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Pittsburgh, PA 15222
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rroteman@stonecipherlaw.com

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From: Joan DeArment <jdearment@stonecipherlaw.com>

Sent: Monday, October 2, 2023 11:30 AM

To: Ron Roteman <rroteman@stonecipherlaw.com>

Subject: September 2023 Pre-bills

Hi, Ron. Here are your September pre-bill worksheets. I did also include review.
Please let me know if you have any revisions or edits. Thank you!

Joanie

Joan DeArment

Paralegal

Stonecipher Law Firm

125 First Avenue

Pittsburgh, PA 15222-1590

(412) 391-8510

Fax (412) 391-8522

E-mail: jdearment@stonecipherlaw.com

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Ron Roteman

From: Joan DeArment
Sent: Tuesday, October 3, 2023 10:28 AM
To: susan.leslie2@yahoo.com; braddleslie1877@gmail.com
Cc: Ron Roteman
Subject: Stonecipher Law Firm / September 2023 invoice
Attachments: 5348-10_3_2023-Leslie_585.00.PDF

On behalf of Ron Roteman, attached please find your statement for legal services rendered through the month of September 2023. Please don't hesitate to contact this office if you have any questions.

Thank you!

Joanie

Joan DeArment

Paralegal

Stonecipher Law Firm

125 First Avenue

Pittsburgh, PA 15222-1590

(412) 391-8510

Fax (412) 391-8522

E-mail: jdearment@stonecipherlaw.com

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Stonecipher Law Firm

125 First Avenue

Pittsburgh, PA 15222

Phone: 412-391-8510 Fax: 412-391-8522

Tax ID No. 25-1235773

Brad and Susan Leslie
4100 Karla Dr.
Butler, PA 16001

October 3, 2023

LEGAL SERVICES RENDERED THROUGH SEPTEMBER 30, 2023

SCBS # 585.00_Leslie

Balance
\$759.97

Stonecipher Law Firm

125 First Avenue
Pittsburgh, PA 15222
Phone: 412-391-8510 Fax: 412-391-8522

Brad and Susan Leslie
4100 Karla Dr.
Butler, PA 16001

October 3, 2023
585.00_Leslie
Invoice # 5348

LEGAL SERVICES RENDERED THROUGH SEPTEMBER 30, 2023

| | <u>Amount</u> |
|----------------------------------|----------------------|
| Previous balance | \$11,676.17 |
| Accounts receivable transactions | |
| 10/3/2023 Write off balance | <u>(\$11,676.17)</u> |
| Total payments and adjustments | <u>(\$11,676.17)</u> |
| Balance due | <u><u>\$0.00</u></u> |

Stonecipher Law Firm

125 First Avenue
Pittsburgh, PA 15222
Phone: 412-391-8510 Fax: 412-391-8522

Brad & Susan Leslie
4100 Karla Drive
Butler, PA 16001

October 3, 2023
585.02_Post-Conversion Matters
Invoice # 4118

LEGAL SERVICES RENDERED THROUGH SEPTEMBER 30, 2023

Additional Charges :

| | <u>Amount</u> |
|---------------------------|------------------------|
| 9/28/2023 Postage charges | 26.46 |
| Total additional charges | <u>\$26.46</u> |
| Previous balance | \$733.51 |
| Balance due | <u><u>\$759.97</u></u> |

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Stonecipher Law Firm

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Phone: 412-391-8510 Fax: 412-391-8522
Tax ID No. 25-1235773

LEGAL SERVICES RENDERED THROUGH SEPTEMBER 30, 2023

| | <u>Fees</u> | <u>Costs</u> | <u>Payments</u> | <u>New Balance</u> |
|--------------------------------|---------------|----------------|-----------------|------------------------|
| 585.00_Leslie | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| 585.02_Post-Conversion Matters | \$0.00 | \$26.46 | \$0.00 | \$759.97 |
| GRAND TOTAL | <u>\$0.00</u> | <u>\$26.46</u> | <u>\$0.00</u> | <u><u>\$759.97</u></u> |